

September 1, 2023

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007  
(212) 805-6350  
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*,  
No. 21-cv-2684-VEC

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Dear Judge Caproni:

We represent plaintiff Syracuse Mountains Corporation (“Syracuse”) in the above-referenced action. We write jointly with counsel for defendant Petróleos de Venezuela S.A. (“PDVSA”) pursuant to Rule 5 of your Individual Practices in Civil Cases, seeking permission to file several redacted exhibits in support of the parties’ motions for summary judgment. The parties wish to redact two categories of information: (1) the names of the individual beneficial owners of Syracuse’s shareholders (“the UBOs”); and (2) financial account numbers.

***Names of the UBOs.*** Redaction of the names of the UBOs is appropriate under the Stipulated Confidentiality Agreement and Protective Order (“Confidentiality Agreement”). ECF No. 30. On March 7, 2022, this Court designated names of the UBOs “Confidential” under the Confidentiality Agreement.<sup>1</sup> Pursuant to the Confidentiality Agreement, “[a] party wishing to file in court any Disclosure or Discovery Material designated ‘CONFIDENTIAL’ . . . by another Party must follow the procedures for filing under seal or with redactions as set forth in the Court’s Individual Practices.”<sup>2</sup> The parties have redacted all information relating to the UBOs, in accordance with this Court’s March 7, 2022 Order and the Confidentiality Agreement.

***Financial Account Numbers.*** Redaction of financial account numbers is appropriate under Federal Rule of Civil Procedure 5.2(a)(4), which provides that filings containing a financial account number “may include only the last four digits of the financial-account

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<sup>1</sup> Order dated March 7, 2022, ECF No. 75 (“[A]ny information or documents relating to Plaintiff’s and/or its shareholders’ ultimate beneficial owners and disclosed by Plaintiff to Defendant shall be marked “CONFIDENTIAL,” as defined by the parties’ stipulated confidentiality agreement and protective order at Docket 30.”).

<sup>2</sup> Confidentiality Agreement, ¶ 6.4.



number.” As such, the parties intend to submit exhibits redacting all but the last four digits of any financial account numbers.

Respectfully submitted,

/s/ Daniel H. Weiner

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